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January 6, 2023

VIA ECF

Honorable Valerie Figueredo
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Courtroom 17A
New York, NY 10007

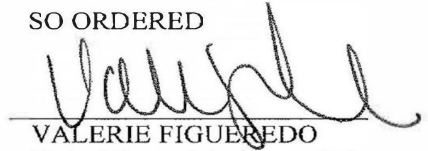
Re: Kyle Bragg v. Alstate Maintenance, LLC
Civ. No. 21 Civ. 09588 (GHW)(VF)

Dear Judge Figueredo:

We represent Defendant Alstate Maintenance, LLC (“Airway”), and submit this joint letter pursuant to the Court’s Order (Dkt. No. 28) and Your Honor’s Individual Rules 1(a) and (e) to respectfully request that the Court reopen discovery for 90 days, to April 5, 2023. This is the parties’ first request for an extension of discovery.

Since the inception of this case the parties have been working diligently to settle this matter, along with the associated case *Kyle Bragg v. Airway Cleaners, LLC*, No. 21 Civ. 09587 (DLC). Over the course of several months of negotiations, including numerous meet and confers, four (4) mediation sessions by the Court-appointed Mediator, and repeated exchanges of critical documents as well as Defendant’s payment of thousands of dollars in alleged back-contributions, the parties have been unable to reach a complete resolution. While the parties have made significant progress exchanging documents and information without Court intervention and expensive litigation costs, which have served to highlight and narrow the salient issues in the case, the parties appear to have no choice but to continue the litigation process. As such, and to do so effectively, the parties believe reopening discovery so that it may be completed is necessary. Accordingly, the parties respectfully request that the Court reopen discovery through and including April 5, 2023 (90 days).

SO ORDERED



VALERIE FIGUEREDO

United States Magistrate Judge

Dated: 1-9-2023

Discovery is extended until April 15, 2023. The parties are directed to provide a joint status update by February 27, 2023, detailing what discovery occurred in the previous month, and what discovery is expected in the upcoming month.

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Thank you for Your Honor's consideration of this joint request.

Very truly yours,

JACKSON LEWIS P.C.

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